

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
At Nashville

UNITED STATES OF AMERICA,

PLAINTIFF

v.

CHRIS YOUNG,

DEFENDANT

3:11-00012
SENIOR JUDGE WISEMAN

MOTION TO CONTINUE PLEA AND MOTION DEADLINES AND TRIAL DATE

The Defendant, Chris Young, by and through appointed counsel, Hallie H. McFadden, hereby respectfully requests this Court continue Mr. Young's motion deadline and his trial date. The Motion deadline is currently April 9, 2012 and the trial date is June 4, 2012. As grounds for the motion, counsel would show:

The undersigned was appointed on February 28, 2012, after previous counsel moved to withdraw due to health issues. Counsel has spoken with prior counsel's paralegal, who has advised she will prepare copies of the discovery which had been provided to them, but the discovery is so voluminous that it might take her several days to provide it to present counsel. Counsel for the Government has advised if Counsel for Mr. Young is unable to obtain discovery from prior counsel, he would prepare and provide it to Counsel. Counsel has not even had the opportunity to meet Mr. Young, and clearly has not had the opportunity to review the evidence and investigate this matter properly. As the Court has made clear in several orders, the discovery is voluminous and the case is extended and complex.

Counsel for Mr. Young is extremely cognizant of the Court orders continuing this matter, and most especially of the Court's order dated September 8, 2011, ordering the trial date of June 4, 2012 to be a firm date (as well as the Court's order dated January 6, 2012 reaffirming that date). Counsel, however, respectfully asserts, based on the representations of prior counsel, co-defendants' counsel and the Assistant United States Attorney, the discovery is so voluminous and complex she does not believe she can be prepared to effectively represent Mr. Young in three months. Although clearly this delay will impact Mr. Young and the Government to some extent, any delay or prejudice is substantially outweighed by the necessity to provide Mr. Young with effective assistance of counsel.

Counsel for Mr. Young has discussed this motion with counsel for the Government, and there is no objection to continuing the motion deadline, as well as the trial date in this matter. Counsel for Mr. Young submits that the ends of justice served by granting this continuance outweigh the interest of Mr. Young and the public in a speedy trial. 18 U.S.C. §3161(h)(8)(A).

For all the above reasons, Counsel for Mr. Young requests that the above dates be continued.

Respectfully submitted,

LAW OFFICES OF
HALLIE H. McFADDEN, P.C.

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on March 2, 2012, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

/s/ Hallie H. McFadden